

(Del. Rev. 11/14) Pro Se General Complaint Form

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

Kisha Baldwin
132 Chestnut Street
Middlesex, New Jersey 08846
(In the space above enter the full name(s) of the plaintiff(s).)

2023 JUL 14 AM 10:18
 CIV. ACTION NO. **23-768**
 (To be assigned by Clerk's
 Office)

-against-

Wilmington Housing Authority
400 North Walnut Street
Wilmington, Delaware 19801

COMPLAINT
(Pro Se)

Jury Demand?

☐ Yes

☐ No

*(In the space above enter the full name(s) of the defendant(s).
 If you cannot fit the names of all of the defendants in the
 space provided, please write "see attached" in the space
 above and attach an additional sheet of paper with the full list
 of names. The names listed in the above caption must be
 identical to those contained in Section I. Do not include
 addresses here.)*

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

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I. PARTIES IN THIS COMPLAINT**Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

Baldwin, Kisha N
Name (Last, First, MI)

132 Chestnut Street
Street Address

Middlesex
County, City

New Jersey
State

08846
Zip Code

973-776-4355
Telephone Number

Kisha-baldwin@yahoo.com
E-mail Address (if available)

Defendant(s)

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

Wilmington Housing Authority
Name (Last, First)

400 North Walnut Street
Street Address

Wilmington
County, City

Delaware
State

19801
Zip Code

Defendant 2:

Johnson Andrew
Name (Last, First)

400 North Walnut Street
Street Address

Wilmington
County, City

Delaware
State

19801
Zip Code

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Defendant(s) Continued

Defendant 3:

Fitzgerald, Raymond
Name (Last, First)400 North Walnut Street
Street AddressWilmington
County, CityDelaware
State19801
Zip Code

Defendant 4:

Name (Last, First)_____
Street Address_____
County, City_____
State_____
Zip Code**II. BASIS FOR JURISDICTION***Check the option that best describes the basis for jurisdiction in your case:*

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☐ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☐ **Federal Question:** Claim arises under the Constitution, laws or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

Plaintiff Kisha Baldwin filed complaint against Wilmington Housing Authority (WHA) in Wilmington, Delaware for employment discrimination cases of Harassment, Disciplined and Discharged family care Responsibility.

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III. VENUE

This court can hear cases arising out of the Counties of New Castle, Kent, and Sussex in the State of Delaware.

Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because:

The Wilmington Housing Authority is within the jurisdiction over this action involves federal questions Regarding of claim state and local laws because the events or Omissions was unlawful employment best practices in the alleged occurred in this district.

IV. STATEMENT OF CLAIM

Place(s) of
occurrence:

Wilmington Housing Authority

Date(s) of occurrence: *Sept 7, 2021 to January 14, 2022*

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

What
happened to
you?

The plaintiff filed a charge of discrimination with Equal Employment Opportunity Commission (EEOC), alleging violations of Title VII of Civil Right Act of 1964, arise out of Harrassment, Disciplined and Discharge of job duties basis of sex, family care Responsibility and retaliation claim. EEOC completed invest-igation of the charge and issues plaintiff

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notice of right to sue, Plaintiff was asked to abruptly force to leave the employer premises at Wilmington Housing Authority, the complaint to add claims the defendants violated Title VII as well.

Was anyone
else
involved?

Plaintiff Kisha Baldwin is a resident of Middlesex, New Jersey. at all Relevant times, Plaintiff is and has been a resident of state of New Jersey and met the definition of an "employee" under all applicable statutes.

Wilmington Housing Authority (WHA) was engaged in the operations of public housing in the Wilmington, Delaware area. at all Relevant times.

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Defendant Raymond Fitzgerald is the acting Executive Director of Wilmington Housing Authority Resided in state of Delaware at all Relevant times. Defendant is the directly participated in the discriminatory, harassment of the unlawful business practices and behavior which Result in the termination of employment Plaintiff without merit and was the "aider" and "abettor" under all Relevant statutes.

Defendant Andrew Johnson is the new acting Director of Capital Development of Wilmington Housing Authority resided in the state of Delaware. At all Relevant times, Defendant is the main participated in discriminatory, harassment of the unlawful employment behaviors taken against Plaintiff and was the "aider" and "abettor" under all Relevant statutes.

Who did
what?

Plaintiff is a heterosexual female and former of Wilmington Housing Authority.

Plaintiff was employed by Wilmington Housing Authority from September 7, 2021 to January 14, 2022; as the Director of Capital Development Report to defendant of Raymond Fitzgerald Executive Director.

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V. INJURIES*If you sustained injuries related to the events alleged above, describe them here.*

Prior to accepting employment with Wilmington Housing Authority ask to work with Defendant Andrew Johnson who harassed and Retaliation against the Plaintiff for getting the job as Director of Capital Development, at Wilmington Housing Authority where employment: The plaintiff was verbally and physical harassment use disciplined from Executive Director (Raymond Fitzgerald) was discharged based on of sex, family care responsibility and Retaliation for engaging into protection activity after Recovering from COVID-19 and care of grandchild under 10 at Relevant time.

VI. RELIEF

The relief I want the court to order is:

- ☒ Money damages in the amount of: \$ 110,000.00
- ☐ Other (explain):

Plaintiff is seeking loss of salary of all monetary and economic damages including, but not limited to loss employment of past and future income wage, compensation job security and other benefit of employment along with emotional distress, humiliation, depression, embarrassment stress, and personal dignity of emotional pain suffered due to lack of employment to pay household bills and punitive damage.

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VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Dated



Plaintiff's Signature

Baldwin, Kisha 14

Printed Name (Last, First, MI)

132 Chestnut Street Middlesex NJ 08846

Address City State Zip Code

973-776-4355

Telephone Number

Kisha-baldwin@yahoo.com

E-mail Address (if available)

List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.